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Attorneys for Defendant
Wells Fargo Bank, N.A. ("Wells Fargo")

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

19 CHARLES P. HAGGARTY and GINA M.
20 HAGGARTY, on behalf of themselves and all
others similarly situated,

Case No.: 3:10-cv-02416-CRB

[Assigned to the Hon. Charles R. Breyer]

21 Plaintiffs,

**JOINT STIPULATION AND [REDACTED]
ORDER CONCERNING DISCOVERY
DEADLINES AND BRIEFING
SCHEDULES AND PAGE LIMITS FOR
MOTION FOR CLASS CERTIFICATION
AND MOTION FOR SUMMARY
JUDGMENT**

22 || V.

23 WELLS FARGO BANK, N.A.

34 Defendant.

1 Pursuant to Civil L. R. 7-12, Plaintiffs CHARLES P. HAGGARTY and GINA M.
 2 HAGGARTY, and Defendant WELLS FARGO BANK, N.A., having met and conferred through
 3 their counsel of record, submit this Joint Stipulation and Proposed Order Concerning Discovery
 4 Deadlines and Briefing Schedule and Page Limits for Motion for Class Certification and Motion
 5 for Summary Judgment.

6 A. The Parties stipulate and propose the following deadlines for discovery:

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 7 1. Fact Discovery Cutoff: | August 3, 2012 |
| 8 2. Initial Expert Disclosures:
At the time of disclosure, the
disclosing party will provide
3 dates between Aug. 3-17,
2012 that the disclosed expert
is available for deposition. | August 3, 2012 |
| 12 3. Rebuttal Expert Disclosures:
At the time of disclosure, the
disclosing party will provide
3 dates between Aug. 17-31,
2012 that the disclosed expert
is available for deposition. | August 17, 2012 |
| 15 4. Expert Discovery Cutoff: | August 31, 2012 |

17 B. The Parties stipulate and propose the following dates, deadlines and page limits regarding
 18 Plaintiffs' Motion for Class Certification and any Motion for Summary Judgment to be
 19 filed by Defendant:

- | | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| 21 1. Hearing on Motion for Class Certification:
a. Motion for Class Certification:
(not to exceed 30 pages) | August 3, 2012 at 10:00 a.m.
June 22, 2012 |
| 23 b. Opposition (not to exceed 30 pages): | July 11, 2012 |
| 24 c. Reply (not to exceed 15 pages): | July 20, 2012 |
| 25 2. Hearing on Motion for Summary Judgment:
a. Motion for Summary Judgment:
(not to exceed 30 pages) | September 14, 2012 at 10:00 a.m.
August 3, 2012 |
| 27 b. Opposition (not to exceed 30 pages): | August 22, 2012 |

1 c. Reply (not to exceed 15 pages): August 31, 2012.
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3 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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5 Dated: June 6, 2012

Respectfully submitted
McCUNE WRIGHT, LLP

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7 By: /s/ Richard D. McCune
Richard D. McCune
8 Attorney for Plaintiffs
9 Charles P. Haggarty and Gina M. Haggarty.

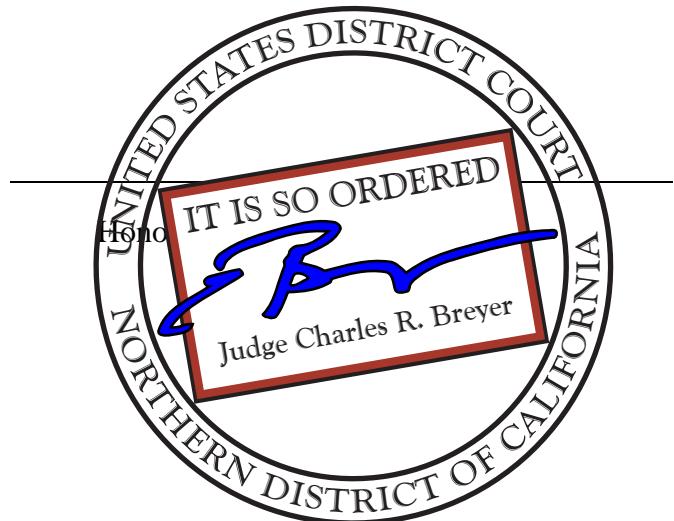
10 Dated: June 8, 2012

REED SMITH, LLP

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12 By: /s/ Jack R. Nelson
Jack R. Nelson
13 Attorneys for Defendant Wells Fargo Bank, N.A.

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15 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

16 DATE: June 12, 2012



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